REMARKS

The present Amendment is in response to the Examiner's Office Action mailed November 21, 2007. Claims 27-33 and 35-53 are cancelled, claim 34 is amended, and new claims 54-74 are added. Claims 34 and 54-74 are now pending in view of the above amendments.

Reconsideration of the application is respectfully requested in view of the above amendments to the claims and the following remarks. For the Examiner's convenience and reference, Applicant's remarks are presented in the order in which the corresponding issues were raised in the Office Action.

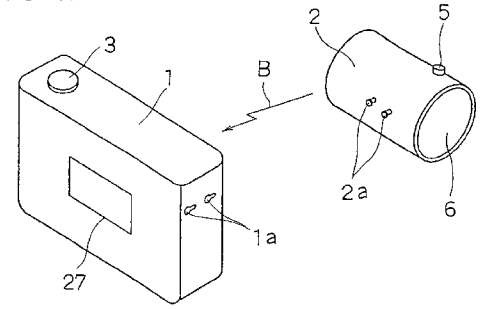
Please note that the following remarks are not intended to be an exhaustive enumeration of the distinctions between any cited references and the claims. Rather, the distinctions identified and discussed below are presented solely by way of example to illustrate some of the differences between the claims and the cited references. In addition, Applicants request that the Examiner carefully review any references discussed below to ensure that Applicants understanding and discussion of the references, if any, is consistent with the Examiner's understanding.

A. Rejection Under 35 U.S.C. §102(b)

The Examiner rejected claims 27-38, 42-47, 49-53 under 35 U.S.C. § 102(b) over *Miki et al.* (United States Patent No. 6,101,339). At least because the *Miki* patent does not teach or suggest each and every element of the rejected claims, Applicants respectfully traverse this rejection in view of the following remarks.

Applicants traverse this rejection generally because the *Miki* patent discloses separate, distinct systems—none of which individually includes each and every element of the rejected claims. In particular, the *Miki* patent discloses a first system that includes a camera body and a lens barrel:

FIG.1



a second system that includes a camera body and a battery pack:

FIG.10

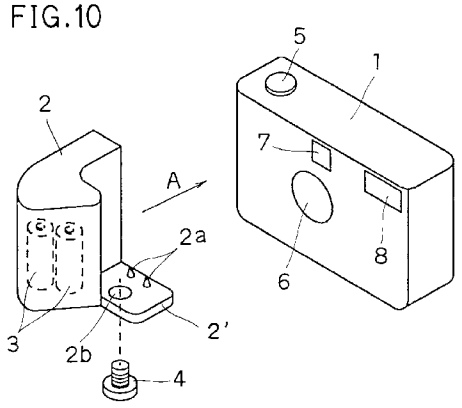
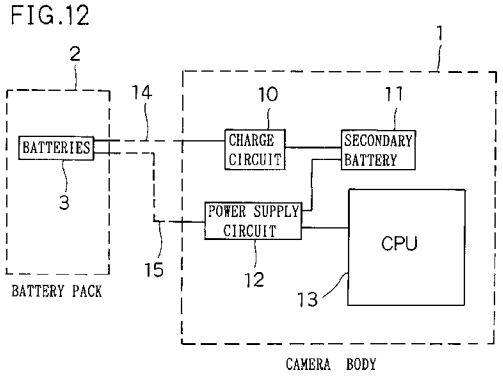
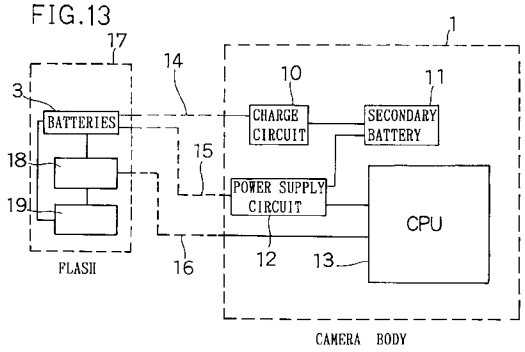


FIG.12



and a third system that includes a camera body and a flash:

FIG.13



Each of these systems includes its own particular set of components, which differs from system to system. None of these systems includes each and every element of the rejected claims.

Because none of these systems includes each and every element of the rejected claims, the Examiner apparently opted to combine features of these different systems in arguing that the *Miki* patent anticipated the claims. In fact, the Examiner made several such inter-system combinations including, but not limited to, the following:

- In rejecting independent claims 27, 34 and 49, the Examiner combined the light emitter 19 of the flash system shown in Figure 13 with the contact pins 2a of the battery-pack system shown in Figure 10;[1]
- in rejecting dependent claims 29, 37, 38, 51 and 52, the Examiner combined aspects of the flash system and the battery-pack system (as discussed above with reference to claims 27, 34 and 49) with additional aspects of the lens system;[2]
- in rejecting dependent claim 30, the Examiner combined aspects of the flash system and the battery-pack system (as discussed above with reference to claim 27) with additional aspects of the battery-pack system;[3]
- in rejecting dependent claim 31, the Examiner combined aspects of the flash system and the battery-pack system (as discussed above with reference to claim 27) with additional aspects of the battery-pack system and additional aspects of the flash system;[4]
- in rejecting dependent claims 32, 42 & 53, the Examiner combined aspects of the flash system and the battery-pack system (as discussed above with reference to claims 27 and 34) with additional aspects of the flash system;[5]
- in rejecting dependent claim 33, the Examiner combined aspects of the flash system and the battery-pack system (as discussed above with reference to claim 27) with additional aspects of the flash system;[6]
- in rejecting dependent claim 43, the Examiner combined aspects of the flash system and the battery-pack system (as discussed above with reference to claim 34) with additional aspects of the flash system;[7] and

[1] *See* Office Action, at 2, 4-5 & 7 (Nov. 21, 2007).
[2] *See* Office Action, at 3, 5-6 & 8 (Nov. 21, 2007) (citing U.S. Patent No. 6,101,339, at 5:17-21).
[3] *See* Office Action, at 3 (Nov. 21, 2007) (citing U.S. Patent No. 6,101,339, at 8:28-30).
[4] *See* Office Action, at 3 (Nov. 21, 2007) (citing U.S. Patent No. 6,101,339, at 8:31-35, 9:26 & Fig. 13).
[5] *See* Office Action, at 3, 6 & 8 (Nov. 21, 2007) (citing U.S. Patent No. 6,101,339, at 9:38-43).
[6] *See* Office Action, at 3 (Nov. 21, 2007) (citing U.S. Patent No. 6,101,339, at 9:30-31 & Fig. 13).
[7] *See* Office Action, at 3 (Nov. 21, 2007) (citing U.S. Patent No. 6,101,339, at 9:36-39).

- in rejecting dependent claim 44, the Examiner combined aspects of the flash system and the battery-pack system (as discussed above with reference to claim 34) with additional aspects of the battery-pack system.[8]

The *Miki* patent, however, does not teach or inherently disclose any of these inter-system combinations made by the Examiner. For example, with respect to the Examiner's rejection of claims 27, 34 and 49, the *Miki* patent never mentions that the contact pins 2a of the battery-pack system shown in Figure 10 should or could be combined with the flash system shown in Figure 13, and the flash system does not inherently include the contact pins 2a. Likewise, the other inter-system combinations made by the Examiner are neither disclosed by nor inherently included in the *Miki* patent.

In sum, anticipation under 35 U.S.C. § 102(b) requires that a single reference explicitly disclose or inherently include a claimed combination. Thus, a dictionary or other reference, for example, that merely lists each word in a claim will not anticipate the claim. Likewise, there cannot be any anticipation under 35 U.S.C. § 102(b) at least because the *Miki* patent does not teach or inherently disclose any claimed combination. If the Examiner maintains that the *Miki* patent explicitly discloses or inherently includes a particular claimed combination—as opposed to merely including isolated features among the different *Miki* systems—Applicants respectfully request that the Examiner identify that explicit disclosure or articulate the reasons why the combinations must be present so that Applicants can understand the Examiner's position and respond appropriately.

Applicants further traverse this rejection because the *Miki* patent does not necessarily include any of the features that the Examiner asserts the *Miki* patent must inherently include. The Applicants traverse, for example, the Examiner's assertions that the *Miki* patent must inherently include the transformer recited in claim 29, the transformer recited in claim 37, the transformer recited in claim 38, the digital camcorder recited in claim 46, the storage device recited in claim 47, the means for transforming an output voltage of the power supply into a standard voltage of the means for providing light recited in claim 51, the means for transforming the output voltage of the power supply into a standard voltage of the image-capturing apparatus recited in claim 51 and the transformer recited in claim 52. The Examiner has not provided any

[8] *See* Office Action, at 3 (Nov. 21, 2007) (citing U.S. Patent No. 6,101,339, at 9:36-39).

reason why these features must be present in any of the systems in the *Miki* patent. If the Examiner maintains that any of these features must inherently be present in the *Miki* patent, Applicants respectfully request that the Examiner articulate the reasons why they must be present so that Applicants can understand the Examiner's position and respond appropriately.

Third, Applicants traverse this rejection because the *Miki* patent does not necessarily include features that the Examiner asserts the *Miki* patent includes. The Applicants traverse, for example, the Examiner's assertion that the "power supply circuits" disclosed in the *Miki* patent are transformers (*see, e.g.*, rejections of claims 30, 34, 37, 38, 51 and 52) and the Examiner's assertion that those "power supply circuits" perform the functions recited in the claims. If the Examiner maintains these assertions, Applicants respectfully request that the Examiner articulate where the *Miki* patent includes these features so that Applicants can understand the Examiner's position and respond appropriately.

Nevertheless, to expedite prosecution, Applicants have amended claim 34 (rewriting it in independent form),[9] and cancelled claims 27-33, 35-38, 42-53 without prejudice to pursuing such subject matter in a related application. As discussed in detail below, claim 34 is allowable over the cited reference.

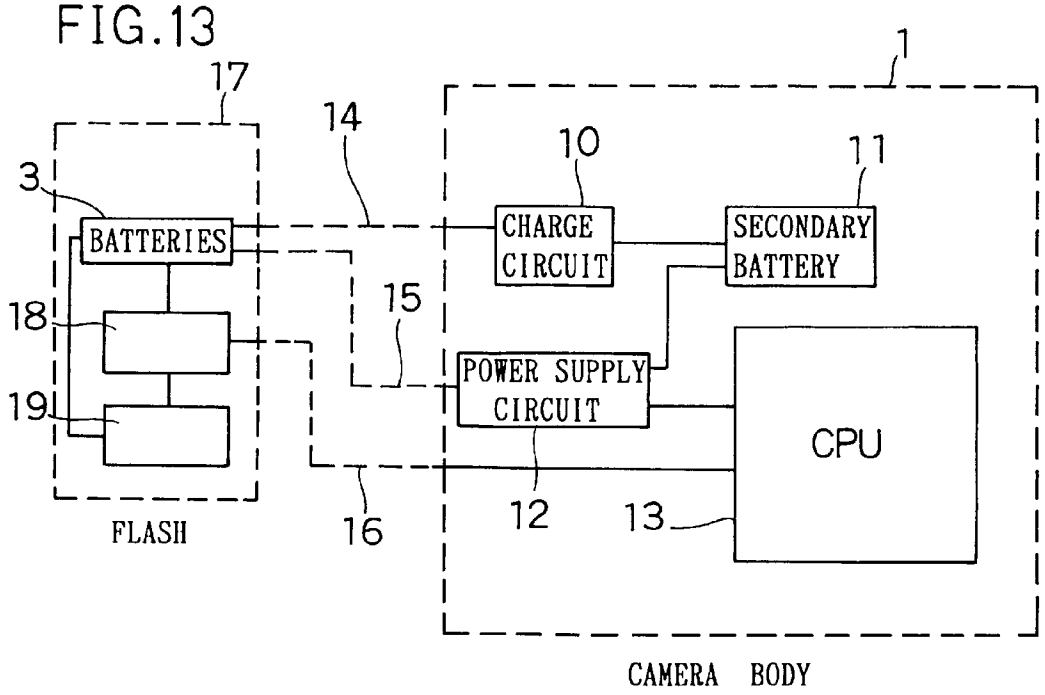
Claim 34 recites, among other things, "a strobe module capable of providing light," "a housing, the strobe module and the power supply being disposed in the housing," "a transformer in the housing and electrically connected to the power supply, the strobe module, and the port, the transformer being capable of transforming an output voltage of the power supply into a standard voltage of the strobe module and outputting the standard voltage of the strobe module to the strobe module, the transformer being capable of transforming the output voltage of the power supply into a standard voltage of the image-capturing apparatus and outputting the standard voltage of the image-capturing apparatus to the image-capturing apparatus via the port." **Thus, claim 34 recites, among other things, a housing, a strobe module disposed in the housing, and a transformer that is (1) in the housing, (2) capable of transforming an output voltage of the power supply into a standard voltage of the strobe module and outputting the standard voltage of the strobe module to the strobe module, and (3) capable of**

[9] As discussed below, Applicants believe claim 34 is allowable over the cited references. If the Examiner provides a new ground of rejection of claim 34 , Applicants request that the Examiner do so in a Non-Final Office Action because the new ground of rejection would not be necessitated by the mere rewriting of this dependent claim in independent form. *See* MPEP 706.07(a), at 700-82 (8th ed. rev. 6 Sept. 2007).

transforming the output voltage of the power supply into a standard voltage of the image-capturing apparatus and outputting the standard voltage of the image-capturing apparatus to the image-capturing apparatus via the port.

In contrast, as shown in Figure 13 of the *Miki* patent, its external flash 17 merely includes batteries 3, a light emission controller 18 and a light emitter 19:

FIG.13



The *Miki* patent does not disclose that the external flash 17 (which the Examiner asserts is a housing) includes a transformer that is capable of transforming an output voltage of the batteries 3 (which the Examiner asserts is a power supply) into a standard voltage of the camera body 1 (which the Examiner asserts is an image-capturing apparatus). Moreover, the *Miki* patent does not disclose that the external flash 17 includes a transformer capable of transforming an output voltage of the batteries 3 into a standard voltage of the light emitter 19 (which the Examiner asserts is a strobe module). And the *Miki* patent certainly does not disclose that the external flash 17 includes any transformer that can output **both** a standard voltage of the camera body 1 and a standard voltage of the light emitter 19 to the camera body 1 and the light emitter 19, respectively. In fact, the *Miki* patent does not disclose or inherently include any transformer in the external flash 17. Accordingly, for at least the foregoing reasons, claim 34 is allowable over the cited references and Applicants therefore request allowance thereof.

B. Rejection Under 35 U.S.C. § 103

The Examiner rejected claims 39-41 and 48 under 35 U.S.C. § 103 over the *Miki* patent. Applicant respectfully traverse this rejection at least because the Examiner relied upon improper Office Notice.

Applicants traverse the Examiner's assertions that I2C, UART and USB interfaces are common in the art at least because the Examiner has not specified "the art" to which the Examiner refers. Consequently, Applicants must traverse this sweeping assertion that each of the I2C, UART and USB interfaces are common. If the Examiner maintains that each of the I2C, UART and USB interfaces are commonly used in the external-flashes-for-cameras art or some other particular art, Applicants respectfully request the Examiner provide examples of each so that Applicants can understand the Examiner's position and respond appropriately.

Applicants also traverse the Examiner's assertions that phone cameras are common in the art at least because the Examiner has not specified "the art" to which the Examiner refers. Consequently, Applicants must traverse this sweeping assertion that phone cameras are common. If the Examiner maintains that phone cameras are commonly used in the external-flashes-for-cameras art or some other particular art, Applicants respectfully request the Examiner provide examples of such so that Applicants can understand the Examiner's position and respond appropriately.

Nevertheless, to expedite prosecution, Applicants have 39-41 and 48 without prejudice to pursuing such subject matter in a related application. Accordingly, this rejection is moot.

CONCLUSION

In view of the foregoing, Applicants believe the claims as amended are in allowable form. In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, or which may be overcome by an Examiner's Amendment, the Examiner is requested to contact the undersigned attorney.

Dated this 21st day of March, 2008.

Respectfully submitted,

/Ryan N. Farr/ Reg. No. 52, 882

RYAN N. FARR
Registration No. 52,882
Attorney for Applicant
Customer No. 022913
Telephone: (801) 533-9800

KJN0000005251V001